

FIELD CHANGE REQUEST (FCR) FORM

Project Name: Arkema Project Area – PDI Phase 1

Project No.: CF167

Client: LSS/Retia USA

Request No.: FCR-01

To: Madi Novak, USEPA

Date: March 17, 2021

Field Change Request Title: Collection of dissolved groundwater samples that have elevated turbidity

Description:

Groundwater samples from some Arkema site monitoring wells have historically had elevated turbidity (i.e., >5 NTU). COC concentrations in turbid samples represent a combination of COCs in particulates from the aquifer and dissolved concentrations in groundwater. Hydrophobic compounds tend to sorb onto particulates, so turbid groundwater samples are biased high and are not representative of dissolved-phases COC concentrations in groundwater. Groundwater samples with low turbidity levels (<5 NTU) are representative of dissolved-phase COC concentrations in groundwater.

Recommended Change:

Groundwater samples are collected using low-flow purging protocols. Low flow purging will continue for a maximum of 2 hours. If the turbidity does not decrease to 5 NTU or lower, total and filtered samples will be collected for the following constituents (if required for the well): pesticides, herbicides, PCBs, SVOCs, dioxins and furans, and metals. The filtered samples will be collected by passing the groundwater through a 0.45 micron filter.

The data for the total (unfiltered) samples will be used for screening against ROD Table 17 cleanup levels. The data for the total and filtered samples will be used to evaluate concentrations of COCs in groundwater for the refinement of the UltraSeep sample locations and for evaluating sediment cap design.

Eron Dodak

Field Operations Lead (or designee)



Signature

March 14, 2021

Date

Approval:

Eron Dodak

Project Manager



Signature

March 14, 2021

Date

Distribution:

LSS Project Coordinator
Integral Project Manager
Field Operations Lead
QA Officer

Project File
Other: